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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA, ) NO. 22-CR-155 CRB  
17 Plaintiff, )  
18 v. ) STIPULATION TO EXCLUDE TIME FROM  
19 JASON DEAN COSTANZA, ) SEPTEMBER 21, 2022 TO DECEMBER 7, 2022  
20 Defendant. ) AND [PROPOSED] ORDER  
21

22 It is hereby stipulated by and between counsel for the United States and counsel for the  
23 defendant Jason Dean Costanza, that time be excluded under the Speedy Trial Act from September 21,  
24 2022 through December 7, 2022.

25 On September 8, 2022, at the request of the parties, the Court vacated the status conference in the  
26 above-referenced matter set for September 21, 2022 and continued this status conference to December 7,  
27 2022. The government and counsel for the defendant stipulate and agree that time be excluded under  
28 the Speedy Trial Act so that defense counsel may continue to prepare, including by reviewing the  
discovery. For this reason, the parties stipulate and agree that excluding time until December 7, 2022  
will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties  
further stipulate and agree that the ends of justice served by excluding the time from September 21, 2022

STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER

Case No. 22-CR-155 CRB

v. 7/10/2018

1 through December 7, 2022 from computation under the Speedy Trial Act outweigh the best interests of  
2 the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

3 The undersigned Assistant United States Attorney certifies that she has obtained approval from  
4 counsel for the defendant to file this stipulation and proposed order.

5

6 IT IS SO STIPULATED.

7 DATED: 9/12/2022

/s/  
KRISTINA GREEN  
Assistant United States Attorney

9 DATED: 9/12/2022

/s/  
GAIL SHIFMAN  
Counsel for Defendant Jason Dean Costanza

12 **[PROPOSED] ORDER**

13 Based upon the facts set forth in the stipulation of the parties and for good cause shown, the  
14 Court finds that failing to exclude the time from September 21, 2022 through December 7, 2022 would  
15 unreasonably deny defense counsel and the defendant the reasonable time necessary for effective  
16 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The  
17 Court further finds that the ends of justice served by excluding the time from September 21, 2022 to  
18 December 7, 2022 from computation under the Speedy Trial Act outweigh the best interests of the  
19 public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS  
20 HEREBY ORDERED that the time from September 21, 2022 through December 7, 2022 shall be  
21 excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

22 IT IS SO ORDERED.

24 DATED: September 23, 2022

  
HONORABLE CHARLES R. BREYER  
United States Senior District Judge